



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 8**  
1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

January 8, 2018

Ref: 8ENF-L

**BY FACSIMILE TRANSMISSION: 503-517-8204**

Dean N. Alterman, Esq.  
Alterman Law Group PC  
Fox Tower  
805 SW Broadway, Suite 470  
Portland, OR 97205

Re: Anaconda Aluminum Co Columbia Falls Reduction Plant National Priorities List Site  
EPA Site ID MTD057561763

Dear Mr. Alterman:

The Environmental Protection Agency (EPA) is in receipt of your letter dated November 28, 2017, on behalf of your client, Calbag Resources, LLC (Calbag). In your letter, you requested EPA approval for the following: 1) the placement of crushed concrete from stockpiles 1, 1A and 2 into the pot room basements; and 2) the placement of crushed concrete that Calbag will produce from the rest of the project into the basements of Pot Rooms 1, 2, 3, and 4. This letter is intended to respond to your November 28, 2017 letter.

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the EPA is responsible for overseeing the investigation and cleanup of the above referenced site (Site), which is in private ownership. The EPA is currently overseeing a remedial investigation and feasibility study being conducted by a potentially responsible party and the current owner, Columbia Falls Aluminum Company (CFAC). As such, the Site is now in the investigatory and characterization stage. The EPA is aware that CFAC has contracted with Calbag to demolish and salvage on-site buildings and potliners at the facility under a State permit pursuant to the Resource Conservation and Recovery Act (RCRA).

The EPA has reviewed the test results you provided with your November 28, 2017 letter, which show that the crushed concrete from Stockpiles 1 and 1A may have elevated fluoride levels above certain regulatory levels which may pose additional risk to groundwater. In light of these test results, this contaminated material is not suitable for on-site disposal. As such, this material must be disposed of safely and responsibly at an appropriate off-site disposal facility. EPA recommends that the concrete excavated from the basements of additional pot rooms continue to be tested for potential hazardous substances.

Mr. Dean N. Alterman, Esq.  
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Thank you for contacting the EPA. Please let me know if I can answer any additional questions.

Sincerely yours,



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cc: Mr. Michael A. Cirian, P.E., EPA  
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